

JOHN W. HUBER, United States Attorney (#7226)  
VERNON STEJSKAL, Assistant United States Attorney (#8434)  
MICHAEL GADD, Special Assistant United States Attorney (#13704)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111-2176  
Telephone: (801) 524-5682

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

---

UNITED STATES OF AMERICA,	:	Case No. 2:16CR00631 DAK
Plaintiff,	:	
v.	:	NOTIFICATION OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY
AARON MICHAEL SHAMO,	:	
DREW WILSON CRANDALL,	:	
ALEXANDRYA TONGE,	:	
KATHERINE BUSTIN,	:	Judge Kimball
MARIO NOBLE, and	:	
SEAN GYGI,	:	
Defendants.	:	

---

The United States of America, by and through the undersigned, hereby files its notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendants.

The United States gives notice that the following is being or has been provided to counsel for defendants:

//

Discovery produced	NOC 01	001-001-001-00001 - 001-001-001-00166 001-002-001-00001 - 001-002-001-00089 001-003-001-00001 - 001-003-001-00042 001-004-001-00001 - 001-004-001-00026 001-005-001-00001 - 001-005-001-00012 001-005-002-00001 - 001-005-002-00276 001-005-003-00001 - 001-005-003-00008 001-005-004-00001 - 001-005-004-00010 001-005-005-00001 - 001-005-005-00008 001-005-006-00001 - 001-005-006-00004 001-005-007-00001 - 001-005-007-00004 001-005-008-00001 - 001-005-008-00002 001-005-009-00001 - 001-005-009-00014 001-005-010-00001 - 001-005-010-00002 001-005-011-00001 - 001-005-011-00002 001-005-012-00001 - 001-005-012-00003 001-005-013-00001 001-005-014-00001 - 001-005-014-00004 001-005-015-00001 - 001-005-015-00009 001-005-016-00001 - 001-005-016-00005 001-005-017-00001 - 001-005-017-00020 001-005-018-00001 - 001-005-018-00002 001-005-019-00001 001-005-020-00001 - 001-005-020-00002 001-005-021-00001 001-005-022-00001 001-006-001-00001 - 001-006-001-00026 001-006-002-00001 - 001-006-002-00046 001-006-003-00001 - 001-006-003-00299 001-006-004-00001 - 001-006-004-00153 001-007-001-00001 001-007-002-00001 001-007-003-00001 001-007-004-00001 001-007-005-00001 001-007-006-00001 001-007-007-00001 001-007-008-00001 001-007-009-00001 001-007-010-00001 001-007-011-00001 001-007-012-00001 001-007-013-00001 001-007-014-00001 001-007-015-00001 001-007-016-00001 001-007-017-00001 001-007-018-00001 001-007-019-00001 001-007-020-00001
--------------------	--------	--

001-007-021-00001  
 001-007-022-00001  
 001-007-023-00001  
 001-008-001-00001  
 001-008-002-00001 - 001-008-002-00033  
 001-008-003-00001 - 001-008-003-01692  
 001-008-004-00001 - 001-008-004-00016  
 001-008-005-00001 - 001-008-005-00470  
 001-008-006-00001 - 001-008-006-00168  
 001-008-007-00001 - 001-008-007-00086  
 001-009-001-00001 - 001-009-001-00005  
 001-009-002-00001 - 001-009-002-00006  
 001-009-003-00001 - 001-009-003-00154  
 001-009-004-00001 - 001-009-004-00005  
 001-009-005-00001 - 001-009-005-00004  
 001-009-006-00001 - 001-009-006-00009  
 001-009-007-00001 - 001-009-007-00001  
 001-009-008-00001 - 001-009-008-00002  
 001-009-009-00001 - 001-009-009-00001  
 001-009-010-00001 - 001-009-010-00002  
 001-010-001-00001 - 001-010-001-00085  
  
 002-001-001-00001 - 002-001-001-00279  
  
 003-001-001-00001 - 003-001-001-00120  
 003-001-002-00001 - 003-001-002-00020  
 003-001-003-00001 - 003-001-003-00007  
 003-001-004-00001 - 003-001-004-00012  
 003-001-005-00001 - 003-001-005-00004  
 003-001-006-00001  
 003-001-007-00001  
 003-001-008-00001 - 003-001-008-00007  
 003-002-001-00001 - 003-002-001-00007  
 003-003-001-00001  
 003-003-002-00001 - 003-003-002-00002  
 003-003-003-00001  
 003-003-004-00001  
 003-004-001-00001 - 003-004-001-00007  
 003-004-002-00001 - 003-004-002-00003  
 003-004-003-00001  
 003-004-004-00001 - 003-004-004-00012  
 003-004-005-00001 - 003-004-005-00007  
 003-004-006-00001 - 003-004-006-00003  
 003-005-001-00001 - 003-005-001-00006  
 003-005-002-00001 - 003-005-002-00004  
 003-005-003-00001 - 003-005-003-00006  
 003-005-004-00001 - 003-005-004-00079  
 003-005-005-00001 - 003-005-005-00003  
 003-005-006-00001 - 003-005-006-00003  
 003-005-007-00001  
 003-005-008-00001  
 003-006-001-00001 - 003-006-001-00010  
 003-006-002-00001 - 003-006-002-00011

003-006-003-00001 - 003-006-003-00004  
 003-006-004-00001 - 003-006-004-00004  
 003-007-002-00001 (Audio)  
 003-007-003-00001 (Audio)  
 003-007-004-00001 (Audio)  
 003-007-005-00001 (Audio)  
 003-007-006-00001 (Audio)  
 003-007-007-00001 (Audio)  
 003-007-008-00001 (Audio)  
 003-007-009-00001 (Audio)  
 003-008-001-00001  
 003-008-002-00001 - 003-008-002-00169  
 003-009-001-00001  
 003-009-002-00001  
 003-009-003-00001  
 003-009-004-00001  
 003-009-005-00001 - 003-009-005-00002  
 003-010-001-00001 - 003-010-001-00088  
 003-010-002-00001 - 003-010-002-00069  
 003-010-003-00001 - 003-010-003-00107  
 003-011-001-00001 (Audio)  
 003-011-002-00001 (Audio)  
 003-011-003-00001 (Audio)

004-001-001-00001 - 004-001-001-00002  
 004-001-002-00001 - 004-001-002-00005  
 004-001-003-00001 - 004-001-003-00003  
 004-001-004-00001 - 004-001-004-00003  
 004-001-005-00001 - 004-001-005-00003  
 004-001-006-00001 - 004-001-006-00002  
 004-001-007-00001 - 004-001-007-00003  
 004-001-008-00001 - 004-001-008-00003  
 004-001-009-00001 - 004-001-009-00002  
 004-001-010-00001 - 004-001-010-00003  
 004-001-011-00001 - 004-001-011-00002  
 004-001-012-00001 - 004-001-012-00002  
 004-001-013-00001 - 004-001-013-00004  
 004-001-014-00001 - 004-001-014-00005  
 004-001-015-00001 - 004-001-015-00006  
 004-002-001-00001 - 004-002-001-00011  
 004-002-002-00001 - 004-002-002-00006  
 004-003-001-00001 - 004-003-001-00035  
 004-004-001-00001 (Audio)  
 004-004-002-00001 (Audio)  
 004-004-003-00001 (Audio)  
 004-004-004-00001 (Audio)  
 004-004-005-00001 (Audio)  
 004-004-006-00001 (Audio)  
 004-004-007-00001 (Audio)  
 004-004-008-00001 (Audio)  
 004-004-009-00001 (Audio)  
 004-005-001-00001 - 004-005-001-00003  
 004-005-002-00001 - 004-005-002-00002

Additional Audio / Video files	<p> 005-001-001-00001 - 005-001-001-00004  005-001-002-00001 (Audio)  005-001-003-00001 - 005-001-003-00001  005-001-004-00001 - 005-001-004-00002  005-001-005-00001 - 005-001-005-00001  005-002-001-00001 - 005-002-001-00003  005-002-002-00001 - 005-002-002-00002  005-002-003-00001 - 005-002-003-00034  005-003-001-00001 - 005-003-001-00011  005-003-002-00001 - 005-003-002-00093  005-003-003-00001 - 005-003-003-00002  005-003-003-00003 - 005-003-003-00004  005-003-004-00001 - 005-003-004-00519  005-003-005-00001 - 005-003-005-00126  005-003-006-00001 - 005-003-006-00004  005-004-001-00001 - 005-004-001-00222  005-004-002-00001 - 005-004-002-00010  005-004-003-00001 - 005-004-003-00184  005-004-004-00001 - 005-004-004-00002  005-004-005-00001 - 005-004-005-00009  005-004-006-00001 - 005-004-006-00054  005-004-007-00001 - 005-004-007-00034  005-004-008-00001 - 005-004-008-00142  005-004-009-00001 - 005-004-009-00353  005-005-001-00001 - 005-005-001-00002  005-005-002-00001 - 005-005-002-00001  005-005-003-00001 - 005-005-003-00112  005-005-004-00001 - 005-005-004-00001  005-005-005-00001 - 005-005-005-00001  005-005-006-00001 - 005-005-006-00001  005-005-007-00001 - 005-005-007-00001  005-006-001-00001 - 005-006-001-00212  005-007-001-00001 - 005-007-001-00012  005-007-002-00001 - 005-007-002-00014  005-007-003-00001 - 005-007-003-00007  005-007-004-00001 - 005-007-004-00005  005-007-005-00001 - 005-007-005-00005  005-007-006-00001 - 005-007-006-00011  005-008-001-00001 - 005-008-001-00001  005-008-002-00001 - 005-008-002-00002    002-007-008-00001 (Tonge video)  003-007-001-00001 (Bustin video)  003-012-001-00001  003-012-002-00001  003-012-003-00001  003-012-004-00001  003-012-005-00001  003-012-006-00001  003-012-007-00001  003-012-008-00001  003-012-009-00001 </p>
--------------------------------	---

	003-012-010-00001
	003-012-011-00001
	003-012-012-00001
	003-012-013-00001
	003-012-014-00001
	003-012-015-00001
	003-012-016-00001
	003-012-017-00001
	003-012-018-00001
	003-012-019-00001
	003-012-020-00001
	003-012-021-00001
	003-012-022-00001

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and

- c. A written summary of the testimony of any expert the defendant intends to use at trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 29th day of June, 2017.

JOHN W. HUBER  
United States Attorney

/s/ Vernon Stejskal  
VERNON STEJSKAL  
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing NOTIFICATION OF COMPLIANCE was made available to all parties named below, this 29th day of June, 2017.

Gregory G. Skordas Attorney for Def. Shamo (1) 560 South 300 East Suite 225 Salt Lake City, Utah 84111 <a href="mailto:gskordas@schhlaw.com">gskordas@schhlaw.com</a>	James C. Bradshaw Mark Moffat Attorneys for Def. Crandall (2) 422 North 300 West Salt Lake City, Utah 84103 <a href="mailto:jim@brownbradshaw.com">jim@brownbradshaw.com</a> <a href="mailto:mark@brownbradshaw.com">mark@brownbradshaw.com</a>
Ed Brass Attorney for Def. Tonge (3) 175 East 400 South, #400 Salt Lake City, Utah 84111 <a href="mailto:ed@edbrasslaw.com">ed@edbrasslaw.com</a>	Earl Xaiz Attorney for Def. Bustin (4) 175 East 400 South, #400 Salt Lake City, Utah 84111 <a href="mailto:earlxaiz@gmail.com">earlxaiz@gmail.com</a>
Kyler E. Ovard Attorney for Def. Noble (5) 1041 W SoHo Midvale, Utah 84047 <a href="mailto:kovard@sb-legal.net">kovard@sb-legal.net</a>	Brett L. Tolman Eric Benson Attorneys for Def. Gygi (6) 36 S State Street, Suite 1400 PO Box 45385 Salt Lake City, Utah 84145-0385 <a href="mailto:btolman@rqn.com">btolman@rqn.com</a> <a href="mailto:ebenson@rqn.com">ebenson@rqn.com</a>

/s/ Yvette Laughter  
Litigation Support Specialist